

1 KAREN M. STEVENS  
California Bar No. 110009  
2 185 W. F Street, Suite 100  
San Diego, California 92101  
3 Telephone: (619) 239-8553  
Facsimile: (619) 239-0056  
4 kstevenssq@hotmail.com

5 Attorney for Gerardo Salto-Rocha

6  
7  
8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE BARRY TED MOSKOWITZ)

10 UNITED STATES OF AMERICA, ) Case No. 08CR2430-1-BTM  
11 )  
Plaintiff, ) Date: August 15, 2008  
12 ) Time: 2:30 p.m.

13 v. )

14 GERARDO SALTO-ROCHA (1), ) **NOTICE OF OPPOSITION AND**  
JOSE HERNANDEZ-RIVAS)(2) ) **OPPOSITION TO MOTION FOR**  
15 ) **VIDEOTAPED DEPOSITION OF**  
16 ) **MATERIAL WITNESSES**

16 Defendants. )  
17 )

17 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, and  
18 PETER MAZZA, ASSISTANT UNITED STATES ATTORNEY  
GAYLE MAYFIELD-VENIERIS, MATERIAL WITNESS ATTORNEY:

19  
20 PLEASE TAKE NOTICE that on August 15, 2008, at 2:30 p.m., or as soon  
21 thereafter as counsel may be heard, the defendant, Gerardo Salto-Rocha,  
22 by and through his attorney, Karen M. Stevens will ask this Court to deny  
23 the pending motion for a videotaped deposition of the material witnesses.

24 //

25 **MOTIONS**

26 Gerardo Salto-Rocha, by and through his attorney, pursuant to the  
27 Amendments to the United States Constitution, Federal Rules of Criminal  
28 Procedure, and all other applicable statutes, case law and local rules,

1 hereby moves this Court for an order:

2 **Denying Motions For Videotaped Depositions**

3 This opposition is based upon the instant opposition and notice of  
4 opposition, the attached statement of facts and memorandum of points and  
5 authorities, and any and all other materials that may come to this  
6 Court's attention at the time of the hearing on this motion.

7 Respectfully submitted,

8 /s/ Karen M. Stevens

9 Dated: August 8, 2008

KAREN M. STEVENS

Attorney for Gerardo Salto-Rocha

PROOF OF SERVICE

I, the undersigned, declare that:

1. I am over eighteen (18) years of age; am a resident of the County of San Diego, State of California; and my business address is 185 W.F. Street, Suite 100, San Diego, California, 92101.

2. I am effecting service of DEFENDANT'S MOTIONS on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them:

PETER MAZZA, Assistant U.S. Attorney  
Office of the U.S. Attorney  
880 Front Street  
San Diego, CA 92101

DAVID BAKER  
419 19<sup>TH</sup> Street  
San Diego, CA 921022

GAYLE MAYFIELD-VENIERIS  
462 Stevens Avenue, Suite 303  
Solana Beach, CA 92075

3. I hereby certify that I have mailed the foregoing, by United States Postal Service to the following non-EFC participants in this case:

1. N/A

to the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 8, 2008

S/Karen M. Stevens  
KAREN M. STEVENS